

UNITED STATES DISTRICT COURT

DISTRICT OF NEW HAMPSHIRE

C.A. No.

NIMCO REAL ESTATE ASSOCIATES, LLC,
ULTIMA NASHUA EQUIPMENT CORPORATION,)
and ANOOSH IRVAN KIAMANESH,)
Plaintiffs,)

v.)

FEDERAL HIGHWAY ADMINISTRATION)
CITY OF NASHUA, and VARIOUS UNAMED)
OFFICIALS of the AFORESAID)
AGENCIES and of the NEW HAMPSHIRE)
DEPARTMENT OF TRANSPORTATION,)
Defendants.)

MOTION TO ADMIT MARK S. BOURBEAU, ESQ. PRO HAC VICE

Now comes William Aivalikles, Esq., a member of the bars of this court and of the State of New Hampshire, and moves this honorable court, pursuant to LR. 83.2(b), to admit Pro Hac Vice Mark S. Bourbeau of the bars of the US District Court for the District of Massachusetts, and of the Supreme Judicial Court of Massachusetts, so that he may act as co-counsel for Plaintiffs in the above-referenced action.

As grounds therefore, this is a complicated case with questions involving eminent domain and the interrelationship and functioning of constitutional principles and federal and state laws and regulations for real property acquisition and relocation of displaced persons and businesses.

Mr. Bourbeau has extensive experience dealing with eminent domain and relocation, and the federal and state regulatory requirements.

Mr. Bourbeau has previously practiced in New Hampshire Pro Hac Vice in the high-value eminent domain case entitled 107 Indian Rock. Road, LLC, et al v. State of New Hampshire, Docket Number 218-2009-EQ-0505 in Rockingham County Superior Court, as co-counsel with George Moore of Devine, Millimet and Branch, PA, which case was tried to verdict in 2013.

Mr. Bourbeau's Affidavit is attached in accord with LR 83.2(b)1.

Wherefore, the undersigned counsel requests this motion be granted.

Respectfully Submitted,

September 9, 2016

/s/ William Aivalikles
William E. Aivalikles, Bar No. 308
60 Main Street, Suite 230
Nashua, NH 03060
(603) 880-0303